
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	CRIMINAL COMPLAINT
	:	
v.	:	Mag. No. 10-4190
	:	
LACHEZAR LAZAROV & GEORGI NIKIFOROV	:	HON. CLAIRE C. CECCHI

I, Jeffrey Dant, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Secret Service, and that this Complaint is based on the following facts:

SEE ATTACHMENT B

Continued on the attached pages and made a part hereof: X Yes No




Special Agent Jeffrey Dant
United States Secret Service

Sworn to before me and subscribed in my presence,

Oct 25, 2010, at Newark, in the District of New Jersey

HONORABLE CLAIRE C. CECCHI
UNITED STATES MAGISTRATE JUDGE



Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Conspiracy to Commit Bank Fraud)

From in or about September 2008 through in or about October 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants

LACHEZAR LAZAROV
and
GEORGI NIKIFOROV

did knowingly and willfully conspire with each other and others to execute and attempt to execute a scheme and artifice with the intent to defraud a financial institution, namely Valley National Bank, and to obtain money, funds, and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344, in violation of Title 18, United States Code, Section 1349.

COUNT TWO

(Aggravated Identity Theft)

On or about October 19, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants

LACHEZAR LAZAROV
and
GEORGI NIKIFOROV

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, namely an ATM card containing identity information, including the bank account number of an individual identified as "J.P.," during and in relation to a felony violation of a provision contained in chapter 63, United States Code, that is, conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349, charged in Count One of this Complaint, in violation of Title 18, United States Code, Section 1028A(a)(1) and Section 2.

ATTACHMENT B

I, Jeffrey Dant, am a Special Agent with the U.S. Secret Service. I have knowledge of the facts set forth below from my involvement in the investigation, review of documents, videos, reports, and interviews with witnesses and discussions with other law enforcement officials. This affidavit is submitted for a limited purpose, and I have not set forth each and every fact that I know concerning this investigation.

1. At all times relevant to this Complaint, Valley National Bank, ("the Bank") was a federally insured financial institution as that term is defined by 18 U.S.C. § 20.

2. On numerous dates between on or about September 13, 2008 and on or about September 19, 2008, defendants **LACHEZAR LAZAROV** and **GEORGI NIKIFOROV**, along with another conspirator designated as "CW," installed a number of electronic devices on ATMs at the Bank's branches located in Nutley, New Jersey and in Belleville, New Jersey. These devices were capable of recording bank customer information encoded on credit and debit cards ("skimming devices"). In addition, defendant **LACHEZAR LAZAROV** and CW installed cameras on the Bank's ATMs that were capable of recording the keystrokes of bank customers as the customers entered Personal Identification Numbers ("PINs") during ATM transactions.

3. Between on or about September 13, 2008 and September 19, 2008, after leaving skimmers and cameras in place for approximately 12 hours, defendant **LACHEZAR LAZAROV** removed the skimmers and video cameras to avoid detection while defendant **GEORGI NIKIFOROV** acted as a lookout.

4. On or about October 20, 2008, in the approximately 21-minute period between 11:44 a.m. and 12:05 p.m., 38 unauthorized withdrawals were made from the ATM at the Valley National Bank branch located at Avenue J in Brooklyn, New York by CW and two other unnamed

conspirators. All of the unauthorized withdrawals were made from 11 accounts that were previously skimmed by defendants **LACHEZAR LAZAROV**, **GEORGI NIKIFOROV** and **CW**, as described in paragraph 2, above, from the accounts at the Bank's branches based in Nutley and Belleville, New Jersey, including an account in the name of "J.P."

5. Defendants **LACHEZAR LAZAROV** and **GEORGI NIKIFOROV** have been identified from the Bank's videotapes of each of the transactions described in paragraphs 2 and 3, above.

6. Between on or about October 19, 2008 and on or about October 22, 2008, three unnamed coconspirators made unauthorized withdrawals from approximately 344 accounts totaling \$278,144 in intended losses and \$191,310 in actual losses, from ATMs in the Bank's branches located in Brooklyn and elsewhere in New York. These unauthorized withdrawals were made from accounts that were opened and maintained at the Bank's New Jersey-based branches in Nutley and Belleville and skimmed by defendants **LACHEZAR LAZAROV** and **GEORGI NIKIFOROV**, as described in paragraph 2, above.

7. The Bank ultimately reversed the unauthorized withdrawals from its customers' accounts, thereby assuming the intended loss of approximately \$278,144.

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UNITED STATES : Mag. No. 10-4190
v. : Hon. Claire C. Cecchi
LACHEZAR LAZAROV & : SEALING ORDER
GEORGI NIKIFOROV

This matter having been brought before the Court upon application of Paul J. Fishman, the United States Attorney for the District of New Jersey (Lorraine S. Gerson, Assistant United States Attorney, appearing), for an order sealing the Complaint, arrest warrant, and all related documents, and for good cause shown,

IT IS on this 25 day of October, 2010,

ORDERED that the Complaint, arrest warrant and all related documents, except for copies of the warrant to be served at the arrest, be and hereby are sealed until further Order of this Court or the arrest of the defendant.


HON. CLAIRE C. CECCHI
United States Magistrate Judge